

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LRN CORPORATION,

Plaintiff,

v.

MARKEL INSURANCE COMPANY and  
ARCH INSURANCE COMPANY,

Defendants.

Case No. 1:20-cv-08431-AJN

**PLAINTIFF'S NOTICE OF DEPOSITION OF ANTHONY F. MARKEL**

**PLEASE TAKE NOTICE** that, pursuant to Federal Rules of Civil Procedure Rule 30, Plaintiff LRN Corporation will take the oral deposition of **Anthony F. Markel**. The deposition shall commence at a time, date and manner determined by the parties following the commencement of discovery following the stay. The deposition will be recorded by stenographic means. Plaintiff also reserves the right to record the testimony by audio or video technology, including videotape and cloud-based technology. Please take notice that the court reporter, a notary public or other person duly authorized by law to administer oaths, may conduct the deposition from a remote location as if the reporter, or other duly authorized person, were physically present in the room with the deponent. The deposition is to be taken for the purposes of discovery, examination, cross-examination, perpetuation of testimony, and any and all purposes allowed by law.

Dated: New York, New York  
July 9, 2021

Respectfully submitted,

/s/ John N. Ellison  
REED SMITH LLP  
599 Lexington Avenue  
New York, NY 10022  
T: (212) 521-5400  
F: (212) 521-5450  
[jellison@reedsmith.com](mailto:jellison@reedsmith.com)

David M. Halbreich (admitted *pro hac vice*)  
355 South Grand Avenue, Suite 2900  
Los Angeles, CA 90071  
T: (213) 457-8000  
F: (213) 457-8080  
[dhalbreich@reedsmith.com](mailto:dhalbreich@reedsmith.com)

Mark S. Hersh (admitted *pro hac vice*)  
10 South Wacker Drive  
Chicago, IL 60606  
T: (312) 207-1000  
F: (312) 207-6400  
[mhersh@reedsmith.com](mailto:mhersh@reedsmith.com)

Lisa A. Szymanski (admitted *pro hac vice*)  
Three Logan Square  
1717 Arch Street, Suite 3100  
Philadelphia, PA 19103  
T: (215) 851-8100  
F: (215) 851-1420  
[lszymanski@reedsmith.com](mailto:lszymanski@reedsmith.com)

*Attorneys for Plaintiff LRN Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I caused a true and correct copy of the foregoing Notice of Deposition to be served via electronic mail on all counsel of record listed below:

Michael R. Delhagen, Esq.  
Jennifer L. Zaluski, Esq.  
TRESSLER LLP  
One Penn Plaza, Suite 4701  
New York, NY 10119  
T: (646) 833-0900  
mdelhagen@tresslerllp.com  
jzaluski@tresslerllp.com

*Counsel for Defendant Markel Insurance  
Company*

Peter Scoolidge  
SCOOLIDGE PETERS RUSSOTTI  
& FOX, LLP  
2 Park Avenue - 20th Floor  
New York, NY 10016  
T: (212) 729-7708  
peter@sprfllp.com

Michael R. Goodstein  
BAILEY CAVALIERI LLC  
10 W. Broad Street, Suite 2100  
Columbus, OH 43215  
T: (614) 229-3231  
mgoodstein@baileycav.com

*Counsel for Defendant Arch Insurance  
Company*

Dated: July 9, 2021

s/John N. Ellison